



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: March 29, 2005

PUBLIC NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

JO: 411104

THE CITY OF SAN DIEGO will be the Lead Agency and will prepare a draft Environmental Impact Report (EIR) for the project described below. Written comments on the scope and content of the proposed draft EIR must be sent to the **City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or e-mail your comments to **DSDEAS@sandiego.gov** with the Project Number in the subject line by no later than 30 days after receipt of this notice. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A draft EIR incorporating public input will then be prepared and distributed for public review and comment.

**General Project Information:**

- Project No. 2731, SCH No. **Pending**
- Community Plan Area: **Southeast San Diego**
- Council District: **8**

**Subject:** **BAY VIEW HOSPITAL REDEVELOPMENT.** COMMUNITY PLAN AMENDMENT, REZONE, PLANNED DISTRICT AMENDMENT, TENTATIVE MAP, SOUTHERN SAN DIEGO PLANNED DISTRICT PERMIT, and either a VARIANCE or a PLANNED DEVELOPMENT PERMIT to demolish two existing hospital/medical buildings and parking lot, remove a temporary office trailer, and construct a new seven-story 313-unit residential development. The proposed project is located on a 2.85-acre site bounded by Island Avenue to the north, 26<sup>th</sup> Street to the east, J Street to the south, and a public alley to the west, within the Grant Hill neighborhood of the Southeast San Diego Community Planning Area. Legal Description: Lots 1 through 16 inclusive and Lots 33 through 48 inclusive, Block 21, L.W. Kimball's Subdivision, Map 56, along with the vacated 20-foot alley being 10 feet on each side of the center line of the alley that was located between the aforementioned lots, said alley vacated and closed for public use per City of San Diego Resolution Number 204330; also including the north 10 feet of J Street abutting Lots 33 through 48 inclusive, said north 10 feet of J Street vacated and closed for public use per City of San Diego Resolution 39740.

**Applicant:** Bayview Community Center, LLC

**Recommended Finding:** Based on an Initial Study, it appears that the proposed project may result in significant environmental impacts in the following area: **Land Use, Aesthetics/Neighborhood Character, Transportation/Circulation, Historical Resources, Paleontological Resources, Light/Glare/Shading, Population and Housing, Human Health/Public Safety/Hazardous Materials, Energy, Water Conservation, Utilities, Public Services, Hydrology/Water Quality, and Recreational Resources.**

**Availability in Alternative Format:** To request the Public Notice, Scoping Letter, Initial Study and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 immediately to ensure availability. This information is ALSO available in alternative formats for persons with disabilities. To request this notice in alternative format, call (619) 446-5000 or (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information, contact Donna Clark at (619) 446-5387. For information regarding public meetings/hearings on this project, contact Patricia Grabski at (619) 446-5277. This notice was published in the SAN DIEGO DAILY TRANSCRIPT, placed on the City of San Diego website (<http://clerkdoc.sannet.gov/Website/publicnotice/publicnoticeqa.html>), and distributed on March 29, 2005.

Chris Zirkle, Assistant Deputy Director  
Development Services Department

Attachments: EIR Scoping Letter  
Figure 1 – Location Map  
Figure 2 – Site Plan

Distribution:

State of California

Integrated Waste Management Board (35)  
Department of Parks and Recreation, Office of Historic Preservation (41)  
State Clearinghouse (46)  
Native American Heritage Commission (56)

County of San Diego

Department of Environmental Health (75)

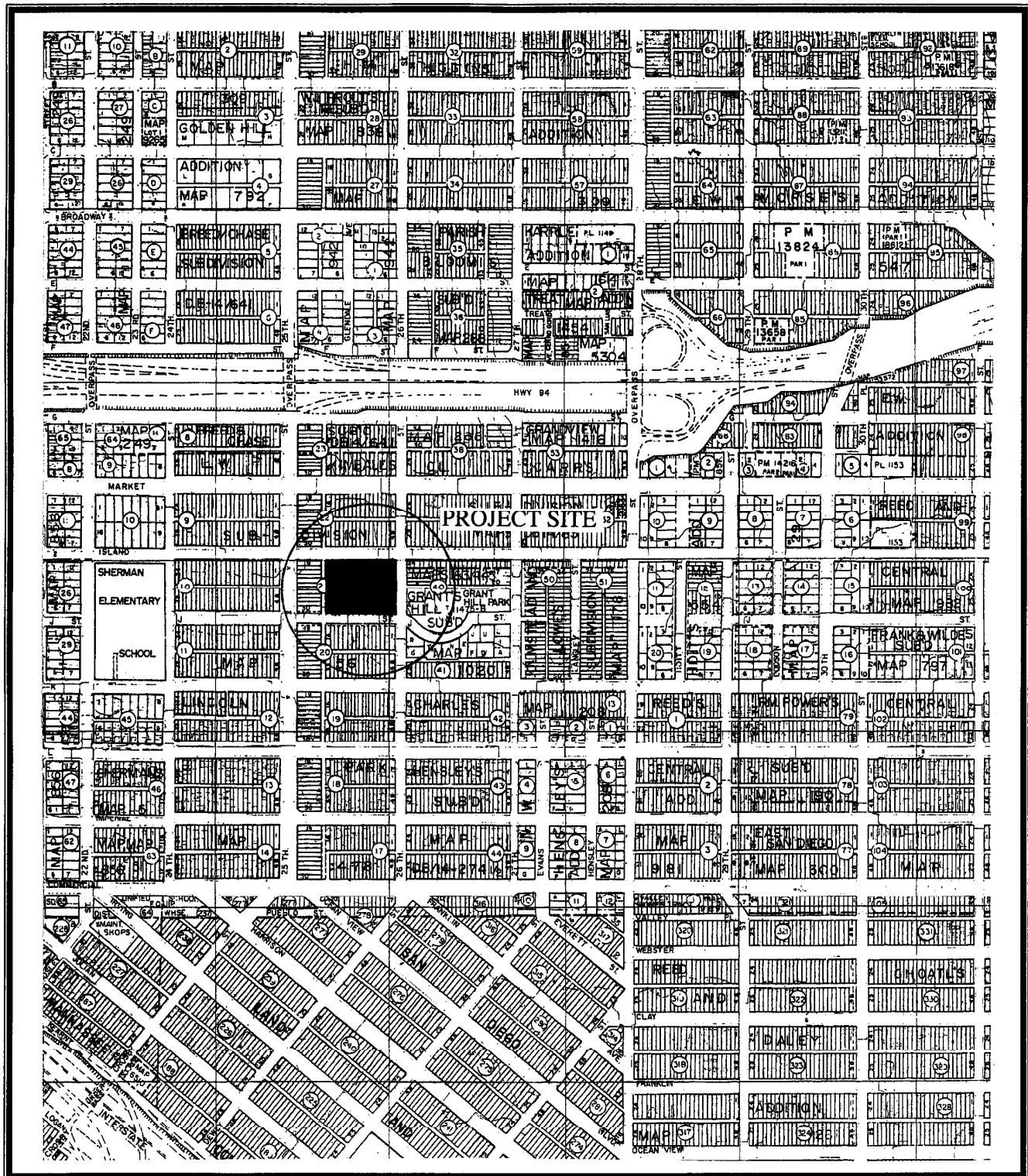
City of San Diego

Councilmember Inzunza, District 8  
Ann French-Gonzalves (78)  
Robert Negrete (78A)  
Fire and Life Safety Services (79)  
Library Department – Government Documents (81)  
Police Research and Analysis (84)  
Engineering and Capital Projects (86)  
Water Review (86A)  
Wastewater Review (86B)  
Mayor's Office (91)  
General Services (92)  
Park Development (93)  
Environmental Services (93A)

Other Organizations and Interested Individuals

San Diego Association of Governments (SANDAG) (108)  
San Diego Transit Corporation (112)  
San Diego Gas & Electric Company (114)  
Metropolitan Transit Systems (115)  
San Diego City Schools (122)  
University of California San Diego Library –Government Document Unit (134)  
San Diego Natural History Museum (166)  
Jerry Schaefer, PhD (209)  
South Coastal Information Center (210)  
San Diego Historical Society (211)  
San Diego Archaeological Center (212)  
Save Our Heritage Organisation (214)  
Ron Christman (215)  
Louie Guasac (215A)  
San Diego County Archaeological Society (218)  
Native American Heritage Commission (222)

Kumeyaay Cultural Repatriation Committee (225)  
Native American Distribution (225A-R)  
Mel Shapiro (258)  
Greater Golden Hill Planning Committee (259)  
Golden Hill Community News (260)  
Southeast San Diego Organizing Project (447)  
Southeast Economic Development Corporation (448)  
Southeastern San Diego Planning Committee (449)  
Encanto Neighborhoods Community Planning Group (449A)  
Educational/Cultural Complex (450)  
Central Imperial Redevelopment Project Area Committee (452)  
Voice News & Viewpoint (453)  
Helix Environmental Planning, Inc., 8100 La Mesa Boulevard, Suite 150, La Mesa, CA 91941-6476



## Location Map

BAY VIEW HOSPITAL REDEVELOPMENT

Environmental Analysis Section Project No. 2731

CITY OF SAN DIEGO · DEVELOPMENT SERVICES

Figure

1

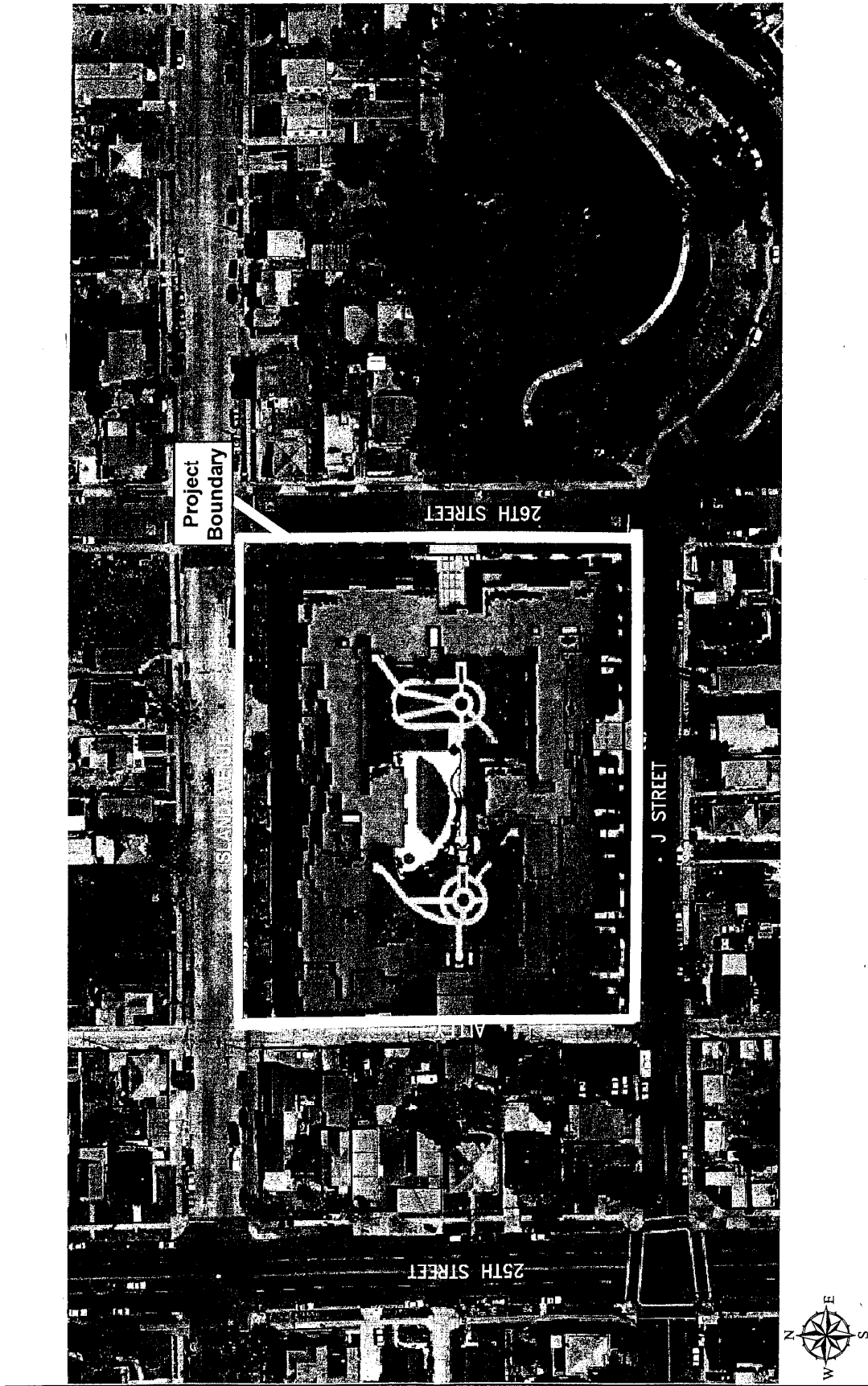


Figure  
**2**

**Site Plan**  
BAY VIEW HOSPITAL REDEVELOPMENT  
Environmental Analysis Section - Project No. 2731  
CITY OF SAN DIEGO - DEVELOPMENT SERVICES





## THE CITY OF SAN DIEGO

March 25, 2005

Norman Jones  
Bayview Transitional Housing Community Center/VesCor Capital Corporation  
446 26<sup>th</sup> Street, Suite 305  
San Diego, CA 92102

SUBJECT: SCOPE OF WORK FOR DRAFT ENVIRONMENTAL IMPACT REPORT  
(EIR) FOR THE BAY VIEW HOSPITAL REDEVELOPMENT PROJECT (PTS  
NO. 2731)

Dear Mr. Jones:

The Environmental Analysis Section (EAS) of the Land Development Review Division (LDR) has conducted an Initial Study for the Bay View Hospital Redevelopment project. The project site is located on a 2.85-acre site bounded by Island Avenue to the north, 26<sup>th</sup> Street to the east, J Street to the south and a public alley to the west. The site is currently developed with two medical buildings (formerly the Physician's and Surgeon's Hospital), a temporary trailer used for a post office, and a parking lot. The project proposes to demolish the existing buildings and parking lot, remove the temporary trailer, and construct a seven-story residential development. The proposed residential development would include a total of 313 housing units, including 28 townhouses and 285 condominium units of which 33 would be affordable housing units and an additional 51 units would qualify as work-force housing. The townhouse units would include 22 two-bedroom units (1,760 square feet to 1,850 square feet) and six three-bedroom units (1,850 square feet to 2,150 square feet). The two-story townhouse units would surround the base perimeter of the building. The condominium units would include 56 one-bedroom units, 36 one-bedroom plus study units, 138 two-bedroom units, and 55 two-bedroom plus study units. Five of the one-bedroom units and 28 of the two-bedroom units would be affordable housing units. The building housing the condominium units would be seven stories from grade level and include two different levels of centered courtyard. Parking would be provided on-site in a three-level parking garage including one subsurface level and two surface parking levels to accommodate a total of 528 spaces. Access to the parking garage is proposed via driveways from Island Street, J Street, and the alley that runs parallel to 25<sup>th</sup> Street. Other proposed improvements would include relocation of existing and proposed underground utilities, new paved sidewalk, curb and gutter, and street landscaping along the length of the site on Island Avenue, 26<sup>th</sup> Street, and J Street. A Community Plan Amendment, Rezone, Planned District Amendment, Tentative Map, Southeastern San Diego Planned District Permit, and either a Variance or a Planned Development Permit would be required.

Based on the results of the Initial Study pursuant to the California Environmental Quality Act (CEQA) of 1970, Section 15063(a) and 15081, as amended, it has been determined that the proposed project may have a significant effect on the environment. The preparation of a draft Environmental Impact Report (EIR) is, therefore, required. This scoping letter is based on the project submittal received by the City of San Diego on November 5, 2004. Further changes to



### Development Services

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Tel (619) 446-5460



the project, prior to release of the draft EIR, may affect the need to address the issues identified in this letter.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR should be prepared in accordance with the City of San Diego's "Environmental Impact Report Guidelines" (enclosed). The issues to be addressed are discussed below. A Notice of Preparation will be distributed to the Responsible Agencies and others who may have an interest in the project. Consequently, changes or additions to this scope of work may be required as a result of input received in response to the Notice of Preparation.

#### I. PROJECT DESCRIPTION

Discuss the goals and objectives of the proposed project. Project objectives will be critical in determining the appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. Describe all discretionary actions needed to implement the project, including all permits required from federal, state, and local agencies. Describe the major project features, including grading (cut and fill) and relocation of existing facilities. Describe any off-site activities necessary to construct the proposed project. The EIR should include sufficient graphics and tables to provide a complete description of all major project features. Include a description of Police and Fire-Rescue facilities serving the project and the response times. Also include a listing of the library and different types of required parks and their current service levels.

#### II. ENVIRONMENTAL SETTING

Describe the precise location of the project and present it on a detailed topographic map and regional map. Provide a local and regional description of the environmental setting of the project, as well as the zoning and land use designations of the site and its contiguous properties, area topography, drainage characteristics, and vegetation. Include any applicable land use plans and/or overlay zones that affect the project site. A description of other utilities that may be present on or in close proximity to the site and their maintenance accesses should be discussed, as well. Also, include information on the existing public services (i.e., police, fire, and emergency medical) that would serve this development.

#### III. ENVIRONMENTAL ISSUES

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any such significant impacts. Below are key environmental issue areas that have been identified for this project, within which the issue statements must be addressed individually. Discussion of each issue statement should include an explanation of the existing project site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis should address potential direct, indirect, and cumulative impacts that could be created through implementation of the proposed project and its alternatives.

Significance determinations made in the EIR should reflect the fact that CEQA does not permit deferral of the establishment of mitigation measures and that an impact should be considered significant if it cannot be demonstrated with certainty that it is not (i.e., if a significant impact "may" result).



### Land Use

**Issue 1: Would the proposed project implement or result in a conflict with the goals, objectives, and recommendations of the City of San Diego Progress Guide and General Plan, the Southeast San Diego Community Plan, and the Southeastern San Diego Planned District Ordinance? How is the proposed project consistent with the land use designation, intensity of development, and environmental goals of these plans?**

Discuss how the project accomplishes or fails to implement the goals, objectives, and recommendations of the Progress Guide and General Plan, the Southeast San Diego Community Plan, and the Southeastern Planned District Ordinance. The site is currently designated for Institutional Use in the community plan, with an objective and recommendation to maintain a hospital use at the site. An amendment to the community plan and a rezone are required for this project. Discuss the community plan amendment and rezone. Assess the compatibility of the proposed project with existing, planned, and proposed land uses in the surrounding community.

### Aesthetics/Neighborhood Character

**Issue 1: Would the proposed project affect the visual quality of the area, particularly with respect to views from public viewing areas, vistas, or open spaces as identified in the community plan?**

**Issue 2: Would the proposed project be compatible with surrounding development in terms of bulk, scale, materials, or style?**

**Issue 3: Would the proposed project substantially alter the existing character of the area?**

**Issue 4: Would the proposed project result in the creation of a negative aesthetic site or project?**

The project site is across 26<sup>th</sup> Street from Grant Hill Park. An objective and recommendation of the Southeastern San Diego Community Plan is to preserve the panoramic view from Grant Hill Park, recommending that the park should be designated as a community observation point. In addition, the community plan recommends that in order to ensure the preservation of the panoramic view from Grant Hill Park, “a 30-foot height limit be imposed on developments within one mile of Grant Hill Park, unless a negative difference in elevation eliminates the need for this requirement”. The project proposes to construct a seven-story, 75-foot high building along the entire 26<sup>th</sup> Street frontage from Island Avenue to J Street. The EIR should discuss any public viewing areas identified in the Southeast San Diego Community Plan and potential project effects on those views should be disclosed, if applicable. Describe design features or mitigation measures that would be

incorporated into the proposed project to reduce or eliminate any potential impacts. Include a photo simulation of the existing and proposed public view from Grant Hill Park.

The project site is surrounded by single family and low density multi-family uses, consisting of one and two-story structures. In addition, the site is adjacent to the Grant Hill Park Historic District and the Sherman Heights Historic District. The community plan contains an objective stating that “infill projects have sometimes been incompatible or insensitive to surrounding development in terms of scale and style” and another objective that the heritage of the area be preserved. The community plan recommends special consideration be given to existing architectural styles. Discuss potential impacts the proposed project may have on the existing neighborhood character and any design features or mitigation measures that would be incorporated into the proposed project to reduce or eliminate any potential impacts.

#### Transportation/Circulation

- Issue 1: Would the proposed project result in traffic generation in excess of the community plan allocation?**
- Issue 2: Would the proposed project result in an increase in projected traffic that is substantial in relation to the existing traffic load and capacity of the street system?**
- Issue 3: Would the proposed project result in a substantial direct and/or cumulative impact upon existing or planned community and regional circulation networks?**
- Issue 4: Would the proposed project result in an increased demand for off-site parking?**
- Issue 5: Would the proposed project result in alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?**

Based on the projected number of average daily trips for the proposed project, a traffic impact analysis is required detailing the project traffic numbers and projected circulation patterns. The EIR should include descriptions and applicable graphics of the existing transportation conditions within the project area and a comparative analysis of projected conditions upon project buildout. Discuss how the proposal fits with the community plan allocations. The traffic analysis in the EIR should also discuss the potential for parking supply effects on-site and any potential effects on off-site parking supply. Include mitigation measures for any potential impacts.

#### Historical Resources

- Issue 1: Would the proposed project result in the alteration or destruction of a prehistoric or historic archaeological site?**
- Issue 2: Would the proposed project result in any adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site?**

**Issue 3: Would the proposed project result in any impact to existing religious or sacred uses within the potential impact area?**

**Issue 4: Would the proposed project result in the disturbance of any human remains, including those interred outside of formal cemeteries?**

The project site is located in an area of high archaeological resource sensitivity. Discuss the proposed project's potential for impacting prehistoric and/or historic resources through grading activities, including excavation for underground parking and off-site trenching for utilities. The EIR should identify requirements for archaeological monitoring during grading operations and specify mitigation requirements for any discoveries. For significant cultural resources identified during monitoring, a Research Design and Data Recovery program would be required.

#### Paleontological Resources

**Issue 1: Would the proposed project impact a unique paleontological resource or site or unique geologic feature?**

The project area is underlain with Bay Point Formation, a geologic formation that has produced large and diverse assemblages of well-preserved marine invertebrate fossils, primarily molluscs. Remains of fossil marine vertebrates such as sharks, rays, and bony fishes have also been recovered. Therefore, the Bay Point Formation has been assigned a high paleontological resource sensitivity. Based on the sensitivity of the formation and the proposed excavation depth of well over ten feet, the project could result in significant impacts to paleontological resources. Discuss the project site's geologic composition as it relates to fossiliferous potential and include paleontological monitoring during grading operations, including excavation for underground parking and off-site trenching for utilities, and specify mitigation requirements for any discoveries.

#### Light, Glare, and Shading

**Issue 1: Would the proposed project result in substantial light, glare, or shading?**

Given the proposed building height of the tallest building (75 feet), the proposed project has the potential to result in substantial light, glare, and/or shading impacts on adjacent properties. Describe the proposed building materials to demonstrate what, if any, glare would result from the proposed building. In addition, a shadow analysis for the proposed project must be included in the EIR. The analysis should address whether any shading effects from the proposed project would preclude the effectiveness of existing and/or future solar panels on surrounding buildings. Include graphics. Describe any measures that would be incorporated into the project to mitigate and/or reduce any potential impacts.

#### Population and Housing

**Issue 1: Would the proposed project induce substantial population growth in an area, either directly or indirectly?**

**Issue 2: Would the proposed project alter the planned location, distribution, density or growth rate of the population of an area?**

The project proposes to construct 313 units in an area of relatively low density. Discuss the potential impacts on population growth as a direct result of the proposed project and the effects on population viewing the project as a precedent setting development for future high-density projects in the general vicinity. In addition, discuss the incorporation of affordable units and work-force units into the proposed project.

Human Health/Public Safety/Hazardous Materials

**Issue 1: Would the proposed project create any known health hazard (excluding mental health)?**

**Issue 2: Would the proposed project expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?**

**Issue 3: Create a future risk of an explosion or the release of hazardous substances (including but not limited to gas, oil, pesticides, radiation, or explosives)?**

**Issue 4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?**

**Issue 5: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

The project site is developed with medical buildings. In the past, the buildings were used as a hospital. Currently, they are primarily used as medical offices. The project site is listed on San Diego County hazardous materials databases. A Phase I site assessment and a limited Phase II investigation were performed and a report prepared. Discuss the results of the report in the EIR.

The review by the San Diego Fire Department indicates that an emergency generator would be required and that the fuel for the generator would be considered HAZMAT and would require a H3 occupancy. In addition to discussing the existing condition of the site, the EIR discussion should include the use, storage, and disposal of the fuel for the proposed emergency generator.

Energy

**Issue 1: Would the proposed project result in the use of excessive amounts of fuel or energy?**

In an effort to avoid or reduce inefficient, wasteful, and unnecessary consumption of energy, the EIR should consider the potentially significant energy implications of the proposed project. This discussion should include a description of the energy consuming equipment and processes that would be used during project construction

and operation. The EIR should also discuss the total energy requirements of the project by fuel type and end use. The impact analysis should determine the effects of the project on local and regional energy supplies and on the requirements for additional capacity, as well as the effects on peak and base period demands for electricity and other forms of energy. Describe any energy conservation design features that would be used to reduce energy consumption over standard building designs. If appropriate, mitigation recommendations could include ways to reduce peak energy demand, the use of energy efficient equipment, and the use of alternative/renewable energy systems.

#### Water Conservation

**Issue 1: Would the proposed project result in the use of excessive amounts of water?**

**Issue 2: Would the proposed project result in landscaping which is predominantly non-drought resistant vegetation?**

San Diego's arid climate and the fact that the majority of the region's water is imported, results in a limited water supply and availability. The recent drought cycles have resulted in a water conservation program throughout the City and region. The EIR should include a discussion on the project's potential for utilizing excessive amounts of potable water during the construction and post-construction phases of the project. Describe how the project would minimize water usage on-site and if the landscaping proposed would be primarily drought tolerant to ensure limited water usage for landscaping. The project must comply with the City of San Diego Landscape Standards and any community plan landscaping requirements.

#### Utilities

**Issue 1: Would the proposed project result in a need for new systems, or require substantial alterations to existing utilities, including the following: natural gas, communications systems, water, sewer, stormwater drainage, or solid waste disposal?**

The effects of the proposed project on the above utilities should be assessed in the EIR for proposed on- and off-site improvements required to serve the project. Also, discuss the project's construction and operational effects on the City of San Diego's ability to handle solid waste.

#### Public Services

**Issue 1: Would the proposed project have an effect upon, or result in a need for, new or altered governmental services in any of the following areas: schools, parks or other recreational facilities, maintenance of public facilities (including roads), or other governmental services?**

The lack of adequate facilities (i.e., parks, libraries) and the effects of new development or planned or increased densities on public services are important issues, but they are not typically CEQA issues. The provision for public services is related to fee schedules and to City Council budget decisions, which cannot be predicated with any accuracy and which fluctuate from year to year. While the adequacy of public

services is not a CEQA issue, it is an important topic, and it is appropriate to include information in environmental documents about the existing conditions of the various services in order to provide decision makers with a broader context of the development proposals they are considering. Include a discussion within the EIR concerning Senate Bill (SD) 50, as it relates to impacts on public schools.

#### Hydrology/Water Quality

- Issue 1: Would the proposed project result in an increase in pollutant discharges, including down stream sedimentation, to receiving waters during or following construction?**
- Issue 2: Would the proposed project result in an increase in impervious surfaces and associated increased runoff?**
- Issue 3: Would the proposed project result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?**

The proposed project would require excavation for underground parking and site grading. Describe how this project would impact the issues listed above and include proposals for mitigation measures through the development of construction and post-construction Best Management Practices (BMPs).

#### Recreational Resources

- Issue 1: Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- Issue 2: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

The project site is located across 26<sup>th</sup> Street from Grant Hill Park. Discuss the potential for impacts to the park due to the proposed project. Describe any recreational facilities that would be included on the project site.

The City of San Diego as Lead Agency has determined that the following issue areas are not potentially significant with the proposed project and do not require analysis in this EIR: Agriculture Resources/Natural Resources/Mineral Resources, Air Quality, Biology, Geology/Soils, and Noise. A separate section of the EIR should include a brief discussion of why these areas were not considered to be potentially significant. However, if these or other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with this division is recommended to determine if these other issue areas need to be addressed in the EIR. Additionally, as supplementary information is submitted, the EIR may need to be expanded to include additional issue areas.

Mitigation measures should be clearly identified, discussed, and their effectiveness assessed in each issue section of the EIR. A Mitigation, Monitoring, and Reporting Program (MMRP) for each mitigation measure must be included. At a minimum, this program should identify: the city department or other entity responsible for the monitoring, the monitoring and reporting schedule, and the completion requirements. The separate MMRP should also be contained (Verbatim) as a separate section, which will be attached to the EIR.

#### IV. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Section 15126.2(c), the EIR must include a discussion of any significant irreversible environmental changes which would be caused by the proposed action should it be implemented. Address the use of nonrenewable resources during the construction and life of the project. See CEQA Section 15127 for limitation on the requirements for this discussion.

#### V. GROWTH INDUCEMENT

The EIR should address the potential for growth inducement through implementation of the proposed project. The document should discuss the ways in which the proposed project could foster economic or population growth, or construction of additional housing either directly or indirectly. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

#### VI. CUMULATIVE IMPACTS

When this project is considered in conjunction with the ultimate build-out of the Southeast San Diego Community, the proposed project could result in significant environmental changes that are individually limited but cumulatively considerable. Therefore, in accordance with CEQA Section 15130, potential cumulative impacts should be discussed in a separate section of the EIR. This section should include all existing and pending development proposals, including those undergoing review with the Development Services Department.

#### VII. ALTERNATIVES

The EIR should place major attention on reasonable alternatives which avoid or mitigate the project's significant environmental impacts. These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected". This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should be explained. At a minimum, the following alternatives should be considered:

### No Project Alternative

The No Project Alternative should address the feasibility of retaining the site in its current state. The EIR should discuss impacts resulting from the proposed project which would be avoided under this alternative.

### Hospital Use Alternative

The Hospital Use Alternative would address the feasibility of returning the existing buildings back to a hospital use, as recommended by the Southeast San Diego Community Plan.

### Reduced Bulk and Scale Alternative

The Reduced Bulk and Scale Alternative would address changing the design of the seven-story building through a reduction in height and width along 26<sup>th</sup> Street in order to preserve existing public views from Grant Hill Park.

### Alternate Location On-Site Alternative

The Alternate Location On-Site Alternative would address moving the seven-story building to a portion of the site with a lower elevation in order to preserve existing public views from Grant Hill Park.

### Reduced Density Alternative

The Reduced Density Alternative would address the feasibility of reducing the proposed number of units.

If, through the environmental analysis, other alternatives become apparent that would mitigate potential impacts, these should be discussed with EAS staff prior to including them in the EIR. It is important to emphasize that the alternatives section of the EIR should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternative analysis.

Based on the issues identified in this scoping letter, it may be possible to avoid and/or reduce all significant impacts to acceptable levels through project redesign and agreement on what constitutes adequate mitigation. If this can be accomplished, an EIR may not be necessary. However, in the event that such agreement cannot be reached, then the EIR should be prepared in draft form by a consultant of your choice, based on the scope of work determined by this office. It is important to note that timely processing of your project will be contingent in large part on your selection of a well-qualified consultant. Prior to starting work on the EIR, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work.

If a screencheck draft EIR is not submitted to EAS for review within 30 days of the date of this letter, the application processing timeline will be held in abeyance until the report has been provided.



Please submit an additional \$7,500.00 deposit to the Development Project Manager with the submittal of the draft EIR. Actual cost of the EIR work on your project will be accounted for against your deposit. Should you have any questions, please contact the environmental analyst, Donna Clark at (619) 446-5387.

Sincerely,



Chris Zirkle  
Assistant Deputy Director  
Development Services Department

Enclosures: City of San Diego Technical Report and Environmental Impact  
Report Guidelines  
City of San Diego Significance Determination Thresholds

cc: Porter Wharton III, 875 Castle Peak Ranch Road, Eagle, Colorado 81631  
Patricia Grabski, Development Project Manager  
Eric Brennecke, LDR-Transportation Development  
Myles Pomeroy, Planning Department  
Anne Longworth, LDR-Planning Review  
Joe Ecclesine, LDR-Engineering Review  
EAS Seniors, Development Services Department